

Subject: Comments regarding critical habitat
From: "Jody Kennedy" <jody@sjcmrc.org>
Date: Thu, 10 Aug 2006 13:20:58 -0700
To: <orcahabitat.nwr@noaa.gov>

Please accept the attached letter from the San Juan County Marine Resources Committee as our comments on the proposed Critical Habitat Areas for the southern resident Orca population.

Thank you for this opportunity to participate. Jody

Jody Kennedy, Coordinator
San Juan Marine Resources Committee
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San Juan County Marine Resources Committee

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August 4, 2006

NOAA Fisheries
Chief - Protected Resources Division
1201 NE Lloyd Blvd., Suite 100
Portland OR 97322-1274

RE: Orca Critical Habitat

To Whom It May Concern:

As an advisory body to San Juan County government on topics relevant to the marine environment, the San Juan County Marine Resources Committee (MRC) respectfully submits the following comments on the proposed Critical Habitat Areas for the southern resident Orca population. Killer whales are an integral part of San Juan County's marine environment, culture and economy. This is especially true of the Southern Residents, which spend much of the year in the San Juan Islands.

The San Juan County Marine Resources Committee supports NOAA/NMFS inclusion of the San Juan region, Puget Sound, and the Strait of Juan de Fuca as critical habitat areas. Our primary area of concern is the exclusion of shallow water habitats. Shallow nearshore waters have been identified by the MRC as very important for the marine ecosystem of San Juan County. Because these habitats support the base of the food chain that orca whales sit in top of waters of less than 20 feet depth should be included as critical habitat for orca recovery.

In addition, the MRC supports expanding the proposed critical habitat areas to include areas of the winter range, including the outer coast of Washington, Oregon, and California and to reevaluate military zones with respect to their critical habitat value.

The San Juan County Marine Resources Committee sees the critical habitat designation component of the recovery planning process as a significant opportunity to improve coordination with British Columbia, as extension of conservation measures beyond our borders will be an essential element of orca recovery.

The MRC also requests that NOAA/NMFS incorporate greater consideration for the potential impacts of an oil spill. The MRC is currently conducting a comprehensive ecosystem-based marine conservation plan for the San Juan Islands. Through this process, large oil spills have been identified by scientists, managers and stakeholders as a significant threat to the health of our marine ecosystem, including the Southern Resident Orca.

Thank you for your consideration. We look forward to working with you to protect and restore Orca habitat and populations.

Sincerely,

A handwritten signature in black ink, appearing to read "Kit Rawson". The signature is written in a cursive, flowing style.

Kit Rawson, MRC Chair